

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SABRINA HART and REKA FUREDI  
on behalf of themselves and all  
others similarly situated, and the  
New York Rule 23 Class,

Plaintiffs,

v.

RCI HOSPITALITY HOLDINGS, INC.  
f/k/a Rick's Cabaret International, Inc.  
RCI ENTERTAINMENT (NEW YORK) INC.,  
PEREGRINE ENTERPRISES, INC.,

Defendants.

Case No. 09-CV-3043 PAE/RLE

**DECLARATION OF  
WILLIAM W. WICKERSHAM**

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I, William W. Wickersham, declare the following:

1. My name is William W. Wickersham. I am over eighteen (18) years of age, and I have personal knowledge of the facts stated in this Declaration.

2. I am the Vice President of Business Development and Client Relations at RG2 Claims Administration, LLC, the Class Administrator chosen by the parties in the above-captioned matter.

3. Throughout the notice process, my office and the parties worked to update and verify Class Members' contact information.

4. After receiving the parties' lists, my office used public records databases, such as the National Change of Address system through the United States Postal Service, to update contact information for class members, deferring to contact information given by Class Counsel where so directed.

5. Throughout the notice period, Class Members updated their contact information with Class Counsel and my office by calling or emailing and providing social security numbers for verification.

6. On April 23, 2015, my office mailed a Pre-Notice Postcard to the 288 Verification Class Members. The Pre-Notice Postcard, which was sent in English, Spanish, and Russian, informed recipients that they would be receiving additional information regarding the settlement.

7. On May 7, 2015, pursuant to the settlement agreement, all Class Members were sent the Court-approved long form notice in English, Spanish, and Russian, which thoroughly explained the settlement and listed, among other things: (1) the total amount the Class Member was expected to receive; (2) explained options of opting out and objecting; (3) explained the process for requesting a name or address change; and (4), for the 288 Verification Class Members, explained the deadline and requirement to submit a form. The objection deadline of July 6, 2015, was clearly stated in the notices sent to class members and made available on the settlement website. As with the objection deadline, the exclusion deadline of July 6, 2015, was clearly stated in the notices sent to Class Members and made available on the settlement website.

8. The notice made clear that the receipt deadline or, if sent by mail, postmark deadline for verification forms was July 22, 2015.

9. This "Late Verification Form Letter" sent by my office explained that Verification forms received or, if sent by mail, postmarked after July 22 and by August 1, 2015, would be accepted if the Class Member explained through a declaration that she had not received notice prior to two weeks before the July 22 deadline due to an address change and provided proof of that address change.

10. If Class Members indicated that they had not received notice due to a change in address, notice was re-mailed to the address provided. Similarly, if notice was returned due an invalid or incorrect address, my office searched public records databases in an attempt to update the address.

11. In 889 of these 1,013 instances of searching for new address for returned mail, my office was able to re-mail to a valid address.

12. On June 22, 2015, pursuant to the settlement agreement, my office mailed a reminder postcard to Class Members who were required to submit verification forms but had not done so. The postcard, sent in English, Spanish, and Russian, reminded class members of the verification deadline.

13. On July 8, 2015, pursuant to the settlement agreement, my office arranged for a reminder text message to be sent to Class Members who were required to submit verification forms but had not yet done so.

14. My office mailed corrective notice to 35 Class Members on July 2, 2015.

15. Throughout the notice process, my office was available to and did receive and respond to phone and email inquiries from Class Members.

16. Additionally, on April 23, 2015, pursuant to the settlement agreement, my office made the settlement website, [www.ricksnywagesettlement.com](http://www.ricksnywagesettlement.com), operational and posted there: (1) the operative complaint; (2) settlement agreement; (3) Plaintiffs' motion for preliminary settlement approval and brief, statements, and exhibits in support; and this Court's Preliminary Approval Order.

17. Plaintiffs' Motion for Attorneys' Fees and Costs and for Service Payments, along with supporting materials, were posted on the website following their filing.

18. No Class Member has objected to any portion of the settlement.

19. After receiving the notices, only 18 members of the 2,208-person class have elected to exclude themselves from this settlement. This number includes 3 people whose exclusion requests were late but are being honored by agreement of the parties.

20. To date, 164 or 56.94% of all Verification Class Members have returned verification forms.

I declare, pursuant to 28 U.S.C. § 1746, and under penalty of perjury, that the foregoing is true and correct.

Dated: 8/5/15

  
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William W. Wickersham